

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

EDSON BROWN,

Defendant.

INDICTMENT

25 Cr.

25 CRIM 241

COUNT ONE  
(Firearms Trafficking Conspiracy)

The Grand Jury charges:

1. Between at least in or about July 2023 through at least in or about February 2025, in the Southern District of New York and elsewhere, EDSON BROWN, the defendant, and others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to traffic in firearms, in violation of Title 18, United States Code, Section 933.

2. It was a part and an object of the conspiracy that EDSON BROWN, the defendant, and others known and unknown, would and did ship, transport, transfer, cause to be transported, and otherwise dispose of a firearm to another person in and otherwise affecting interstate commerce, and did so knowing and having reasonable cause to believe that the use, carrying, and possession of a firearm by the recipient would constitute a felony as defined in Title 18, United States Code, Section 932(a).

(Title 18, United States Code, Section 933(a)(3).)

**COUNT TWO**  
**(Firearms Trafficking)**

The Grand Jury further charges:

3. Between at least in or about July 2023 through at least in or about February 2025, in the Southern District of New York and elsewhere, EDSON BROWN, the defendant, shipped, transported, transferred, caused to be transported, and otherwise disposed of a firearm to another person in and otherwise affecting interstate commerce, and did so knowing and having reasonable cause to believe that the use, carrying, and possession of a firearm by the recipient would constitute a felony as defined in Title 18, United States Code, Section 932(a), to wit, BROWN trafficked firearms from North Carolina and South Carolina to New York, where he sold and distributed them with reasonable cause to believe that the buyers would use, carry, or possess the firearms in manners that would constitute felonies, including possession and receipt of firearms with obliterated serial numbers, in violation of Title 18, United States Code, Section 922(k) and New York Penal Law § 265.02(3).

(Title 18, United States Code, Sections 933(a)(1) and 2.)

**COUNT THREE**  
**(Unlicensed Dealing of Firearms)**

The Grand Jury further charges:

4. Between at least in or about July 2023 through at least in or about February 2025, in the Southern District of New York and elsewhere, EDSON BROWN, the defendant, not being a licensed importer, licensed manufacturer, or licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, willfully and knowingly engaged in the business of importing, manufacturing, and dealing in firearms, and in the course of such business shipped, transported, and received a firearm in interstate and foreign commerce, to wit, BROWN trafficked

firearms from North Carolina and South Carolina to New York, where he sold and distributed them.

(Title 18, United States Code, Sections 922(a)(1)(A) and 2.)

**COUNTS FOUR THROUGH EIGHTEEN**  
**(Unlicensed Transportation of Firearms)**

The Grand Jury further charges:

5. On or about the dates listed below, in the Southern District of New York and elsewhere, EDSON BROWN, the defendant, not being a licensed importer, licensed manufacturer, licensed dealer, or licensed collector of firearms within the meaning of Chapter 44 of Title 18, United States Code, willfully and knowingly transported and received firearms into the state in which he resided, said firearms having been purchased and obtained outside of the state in which he resided, to wit, on or about the dates described below, BROWN, who resided in New York, transported the firearms described below from North Carolina and South Carolina to New York.

<u>Count</u>	<u>Approximate Date</u>	<u>Originating State</u>	<u>Description</u>
Four	July 30, 2023	North Carolina	Three semiautomatic handguns
Five	August 9, 2023	North Carolina	Eight semiautomatic handguns
Six	September 3, 2023	North Carolina	Nine semiautomatic handguns and two revolvers
Seven	September 23, 2023	North Carolina	Eight semiautomatic handguns and two revolvers
Eight	October 11, 2023	South Carolina	Six semiautomatic handguns
Nine	October 24, 2023	North Carolina	Eight semiautomatic handguns and three revolvers
Ten	October 31, 2023	South Carolina	Three semiautomatic handguns
Eleven	December 16, 2023	North Carolina	Nine semiautomatic handguns and one revolver
Twelve	February 9, 2024	South Carolina	One semiautomatic handgun
Thirteen	February 28, 2024	South Carolina	Five semiautomatic handguns
Fourteen	April 21, 2024	South Carolina	Seven semiautomatic handguns and one revolver
Fifteen	June 9, 2024	South Carolina	Eight semiautomatic handguns and one revolver

Sixteen	August 5, 2024	South Carolina	Seven semiautomatic handguns and one revolver
Seventeen	September 1, 2024	South Carolina	Eight semiautomatic handguns and two revolvers
Eighteen	October 19, 2024	South Carolina	Ten semiautomatic handguns and two revolvers

(Title 18, United States Code, Sections 922(a)(3) and 2.)

### **FORFEITURE ALLEGATIONS**

6. As a result of committing the offenses alleged in Counts One and Two of this Indictment, EDSON BROWN, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Sections 924(d)(1) and 934(a)(1), and Title 28 United States Code, Section 2461(c), any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offenses and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses and any and all firearms and ammunition involved in or used in said offenses.

7. As a result of committing the offenses alleged in Counts Three through Eighteen of this Indictment, EDSON BROWN, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28 United States Code, Section 2461(c), any and all firearms and ammunition involved in or used in said offenses.

### **Substitute Assets Provision**

8. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;

- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 924 and 934;  
Title 21, United States Code, Section 853; and  
Title 28, United States Code, Section 2461.)

  
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FOREPERSON

  
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JAY CLAYTON  
United States Attorney